

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

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In re:

MYINT KYAW, a/k/a JEFFREY WU,

Debtor.

Case No.: 820-72407-REG

Chapter 11

Honorable Robert E. Grossman,
U.S.B.J.

Hearing Date: September 13, 2021

**JOINDER TO THE OBJECTIONS OF LANDMARK PORTFOLIO MEZZ, LLC,
AMERICAN CHENGYI INVESTMENT MANAGEMENT GROUP, INC., 41-60 MAIN
STREET, LLC, AND SANFORD AVENUE PARTNER, LLC 'S**

Harary Group, LLC (“Creditor”), an unsecured creditor in these proceedings, and Plaintiff in an adversary proceeding filed against the Debtor Myint Kyaw, a/k/a Jeffrey Wu (“Debtor”), by and through its attorneys, Ansell Grimm & Aaron, P.C., submits the following joinder to the objections of Landmark Portfolio Mezz, LLC, American Chengyi Investment Management Group, Inc., 41-60 Main Street, LLC, and Sanford Avenue Partners, LLC (the “Objectors”) to the Court’s Order to Show Cause as to why the Bankruptcy Case should not be converted to a Chapter 7 from a Chapter 11 (the “Order to Show Cause”).

1. Creditor reached a settlement with Debtor dated June 14, 2021, resolving the proof of claim and adversary proceeding filed by Creditor in this matter. The settlement is contingent on approval of the settlement agreement or the Debtor’s plan of reorganization which incorporates the settlement agreement.

2. Therefore, because Creditor has reached a settlement with Debtor, and understanding that Debtor's other large creditors have reached settlements with Debtor, all of which would be jeopardized by conversion or dismissal of Debtor's case, Creditor hereby joins in the objections of the Objectors to the Order to Show Cause.

3. Given the fluid nature of these discussions and the short timing permitted by the Court to file responses to the Order to Show Cause, Creditor expressly reserves its rights to amend or supplement this Objection.

WHEREFORE, Creditor respectfully requests that the Court deny the Order to Show Cause.

By: s/Anthony J. D'Artiglio
Anthony J. D'Artiglio, Esq.

Dated: September 10, 2021